

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Section 272(f)(1) Sunset of the BOC Separate)	WC Docket No. 02-112
Affiliate and Related Requirements)	

Request for Extension of Comment Period

The Competitive Telecommunications Association (“CompTel”) respectfully requests an extension of the deadline for filing comments in the above-captioned proceeding and a corresponding extension of the deadline to file reply comments. CompTel believes that a grant of this request is in the public interest because CompTel and its members are materially impaired in their ability to file comments in this proceeding without access to an unredacted version of the Report of Independent Accountants on Applying Agreed-Upon Procedures, prepared by Ernst & Young, LLP and filed on December 17, 2001 (“SBC § 272(d) Audit Report”).

CompTel supports AT&T Corp.’s pending request that the Commission require SBC to publicly file an unredacted version of the SBC § 272(d) Audit Report with the Commission.¹ CompTel believes that SBC’s wholesale redactions do not comply with the requirements of the statute and the FCC’s recent Order concerning Verizon’s § 272(d) Audit Report, wherein the Commission found that Verizon must make available a complete report for “public inspection.”² In fact, CompTel will use the results of the Verizon § 272(d) Audit Report to inform its comments in this proceeding, particularly in response to the Commission’s directive that, “To the

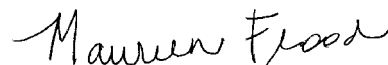
¹ Letter from Aryeh S. Friedman, Senior Attorney, AT&T, to Dorothy Attwood, Chief, Common Carrier Bureau, February 12, 2002.

² *In the Matter of Accounting Safeguards Under the Telecommunications Act of 1996: Section 272(d) Biennial Audit*

extent commenters recommend that the Commission consider BOCs' actual behavior in terms of cost misallocation or other discriminations, *what evidence is there of such behavior and on what evidence should the Commission rely?*"³ Without the ability to review the unredacted SBC § 272(d) Audit Report, CompTel will not have access to all available evidence that could support a more complete response to the Commission's questions.

CompTel asks the Commission to require SBC to publicly file an unredacted version of the SBC § 272(d) Audit Report on an expedited basis. CompTel also asks the Commission to grant a modest extension of time in this proceeding so CompTel can incorporate its review of the Audit Report into our comments. Specifically, CompTel asks the FCC to extend the deadline for filing comments until two weeks after an unredacted SBC § 272(d) Audit Report is filed with the Commission. CompTel also requests a corresponding two week extension to file reply comments. These actions will likely result in a more complete public record and will cause no prejudice to any party. Therefore, CompTel urges the Commission to grant this request.

Respectfully submitted,



Maureen Flood
Director, Regulatory and State Affairs
Competitive Telecommunications
Association
1900 M Street, N.W.
Suite 800
Washington, DC 20036
(202) 296-6650

July 15, 2002

Procedures, Memorandum Opinion and Order, CC Docket No. 96-150 (rel. Jan. 10, 2002).

³ Notice of Proposed Rulemaking at ¶ 15. (emphasis added)